IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

MARYANNE MCCAULEY,))
Plaintiff,) CIVIL ACTION)
vs.) Case No. 4:22-CV-0076
LC REAL ESTATE, LLC and LC RESTAURANT, LLC,)
Defendants.)

MOTION FOR EXTENSION OF TIME

COME NOW Defendants LC Real Estate, LLC, and LC Restaurant, LLC (collectively, "Defendants"), by and through the undersigned counsel, and respectfully request that the Court grant an additional 30 days, through and including October 19, 2022, in which to answer or otherwise respond to the Complaint filed by Plaintiff Maryanne McCauley ("Plaintiff"). In support thereof, Defendants state the following:

- 1. Plaintiff commenced this action on July 19, 2022.
- 2. Defendants executed their respective Waiver of Service of Summons, which Plaintiff filed with the Court on August 15, 2022.
- 3. Defendants' responsive pleading deadline is currently September 19, 2022.
- 4. Plaintiff and Defendants are engaged in discussions to resolve this litigation.
- 5. Defendants respectfully request a 30-day extension of time, through and including October 19, 2022, in which to answer or otherwise respond to the Complaint.
- 6. Counsel for Defendants has conferred with Plaintiff's attorney, Douglas S. Schapiro, who advises that Plaintiff has no objection to the requested extension.

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7. The extension of time is not being requested for any improper purpose and will not prejudice any party to this proceeding.

WHEREFORE, Defendants respectfully request a 30-day extension of time, through and including October 19, 2022, in which to answer or otherwise respond to the Complaint.

Respectfully submitted,

THOMPSON COBURN LLP

By: /s/ Colin J. Pajda Colin J. Pajda, # 71115 One US Bank Plaza, Suite 2700 St. Louis, Missouri 63101 (314) 552-6507 (314) 552-7000 (fax) cpajda@thompsoncoburn.com

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on September 16, 2022, the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon the following:

Douglas Schapiro SCHAPIRO LAW GROUP PL 7301-A W. Palmetto Park Road Ste 100a Boca Raton, FL 33433 561-807-7388 Email: schapiro@schapirolawgroup.com

/s/ Colin J. Pajda